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RE: Brief call on NECEC/CMP

 Label: Permanent (Capstone approach) Expires: Never

MM

Marsh, Michael

Mon 10/21/2019 3:27 PM

Alafat, Beth; LeClair, Jacqueline; Timmermann, Timothy; Margason, Nathan ✕







Beth - Thanks for the response. Others should feel free to respond, or more importantly, add to the list of questions as necessary. I just listed these somewhat quickly, so there are likely other questions that others have (??), so any additional questions would be welcome.

As to the question of the Corps being hesitant to have the applicant pursue road ROW alignments because direct impacts might not be reduced by much, I agree that is likely the way the Corps may see it. However, I would argue that secondary impacts are clearly part of the LEDPA analysis, and if secondary impacts are greatly reduced by road ROWs then that should be fully considered by the Corps in determining the LEDPA.

From: Alafat, Beth <alafat.beth@epa.gov>

Sent: Monday, October 21, 2019 3:07 PM

To: Marsh, Michael <marsh.mike@epa.gov>; LeClair, Jacqueline <Leclair.Jackie@epa.gov>

Cc: Timmermann, Timothy <Timmermann.Timothy@epa.gov>; Margason, Nathan <Margason.Nathan@epa.gov>

Subject: RE: Brief call on NECEC/CMP

Thanks for getting this started Mike. In general I do think that the Corps has responded to our request for a 404 application and we should acknowledge this when we talk to Jay but there are still some issues that need clarification. My responses and questions are below.

-----Original Message-----

From: Marsh, Michael <marsh.mike@epa.gov>

Sent: Monday, October 21, 2019 2:25 PM

To: LeClair, Jacqueline <Leclair.Jackie@epa.gov>; Alafat, Beth <alafat.beth@epa.gov>

Cc: Timmermann, Timothy <Timmermann.Timothy@epa.gov>; Margason, Nathan <Margason.Nathan@epa.gov>

Subject: RE: Brief call on NECEC/CMP

Here's a few issues/questions for the call with the Corps that immediately come to mind. I'm sure others have questions or comments... please add to or expand on these.

1. Clarification on practicability of underground installation along road, rail or other linear corridors. Is the Corps satisfied with CMP response on those alternatives? Is the level of detail provided, especially regarding cost, adequate for the Corps to make a determination regarding practicability?

(If Jay indicates that the Corps is satisfied that underground installation is impracticable, then do we want to query the Corps on why the VT NECPL project, entirely underground, was considered practicable and permitted by the Corps?) -